



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

February 20, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Eli Lilly and Company / 157-18322-00006

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Eli Lilly and Company
1650 Lilly Road
Lafayette, Indiana 47909**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Minor Source Modification No.: 157-18010-00006	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 21, 2003

Minor Permit Modification No.: 157-18322	Pages Modified: 1 through 16
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 20, 2004

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONSTRUCTION CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Effective Date of the Permit [IC13-15-5-3]
- B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]
- B.4 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- B.5 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
- B.6 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.7 Emergency Provisions

C GENERAL OPERATION CONDITIONS

- C.1 Opacity [326 IAC 5-1]
- C.2 Fugitive Dust Emissions [326 IAC 6-4]
- C.3 Operation of Equipment [326 IAC 2-7-6(6)]
- C.4 Stack Height [326 IAC 1-7]
- C.5 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]
- C.6 Compliance Requirements [326 IAC 2-1.1-11]
- C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.8 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.9 Pressure Gauge and Other Instrument Specifications
- C.10 Compliance Response Plan - Preparation, Implementation, Records, and Reports
- C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
- C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

D.1 FACILITY OPERATION CONDITIONS - Bio-Solids Storage Tank A GENERAL CONSTRUCTION CONDITIONS

- D.1.1 Permit No Defense
- D.1.2 Effective Date of the Permit [IC 13-15-5-3]
- D.1.3 Modification to Construction Conditions [326 IAC 2]

GENERAL OPERATION CONDITIONS

Emission Limitations and Standards

- D.1.4 Emission Limitations and Standards [326 IAC 2-2, CP 157-4363 Issued August 28, 1996, and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Monitoring Requirements

- D.1.6 Monitoring Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit) and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.7 Sampling and Analysis Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit), and Amendment 157-8953 Issued November 12, 1997 (Revised by this Permit)]

- D.1.8 Record Keeping Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit), and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

Certification

SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source that produces pharmaceutical products.

Responsible Official:	Lawrence McShane Sr.
Source Address:	1650 Lilly Road, Lafayette, Indiana 47909
Mailing Address:	1650 Lilly Road, Lafayette, Indiana 47909
General Source Phone Number:	765-477-4006
SIC Code:	2834 and 2879
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) bio-solids storage tank (Tank A, Serial no. 890053, Make Great Lake Aquastore, Model no. 3152 GF WT), nominal capacity of 290,000 gallons, controlled by and exhausting to the iron sponge scrubber.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source submitted a Part 70 permit application TV 157-6879-00006 on October 6, 1996, pursuant to 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

-
- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
 - (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
 - (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.5 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.6 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)].

B.7 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

SECTION C**GENERAL OPERATION CONDITIONS****C.1 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (c) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.3 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.4 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]**C.5 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [326 IAC 3-5]

- (a) This section applies to the operation and maintenance of equipment and devices specified in Section D of this permit to determine or monitor compliance, except that it does not apply to continuous emissions monitoring systems or continuous opacity monitoring systems described in Section D.
- (b) Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification, which shall be submitted by the Permittee, does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.
- (d) The Permittee shall keep records of monitoring system operation that include the following:
 - (1) All maintenance logs, calibration checks, and other required quality assurance activities.
 - (2) All records of corrective and preventive action.
 - (3) A log of monitoring system downtime, including the following:
 - (A) Date of monitoring system downtime.

- (B) Time of commencement and completion of each downtime.
- (C) Reason for each downtime.
- (e) The Permittee shall submit a report of monitoring system downtime as specified in Section D. The report shall include the following:
 - (1) Date of monitoring system downtime.
 - (2) Time of commencement.
 - (3) Duration of each downtime.
 - (4) Reasons for each downtime.
 - (5) Nature of system repairs and adjustments.

C.8 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.9 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and

Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, or report. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) bio-solids storage tank (Tank A, Serial no. 890053, Make Great Lake Aquastore, Model no. 3152 GF WT), nominal capacity of 290,000 gallons, controlled by and exhausting to the iron sponge scrubber.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.1.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.4 Emission Limitations and Standards [326 IAC 2-2, CP 157-4363 Issued August 28, 1996, and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

To avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), the Permittee shall comply with the following:

- (a) The total reduced sulfur (TRS) emissions from the iron sponge reactor shall not equal or exceed 2.28 pounds per hour, which is equivalent to 762 micrograms per liter (ug/l). This emission limitation also satisfies the emission limitations for reduced sulfur compounds and hydrogen sulfide; and
- (b) TRS, reduced sulfur compounds and hydrogen sulfide emissions from the transfer of bio-solids from the storage tanks to trucks shall be controlled by a vapor balance system that exhausts to the iron sponge reactor.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements

D.1.6 Monitoring Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit) and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

The Permittee shall monitor and record the pressure drop across the iron sponge reactor annubar once per day. Unless operated under conditions for which the Compliance Response Plan (CRP) specifies otherwise, the pressure drop across the annubar shall be maintained in a range of 0.2 and 2 inches of water column. The CRP for the Iron Sponge reactor system shall contain troubleshooting contingency and response steps for when the pressure reading

is outside of the above-mentioned range for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Sampling and Analysis Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit), and Amendment 157-8953 Issued November 12, 1997 (Revised by this Permit)]

To demonstrate compliance with Condition D.1.4, the permittee shall measure and record the TRS outlet concentration of the air stream to the atmosphere once per calendar week using the sampling protocol and analysis methods most recently approved by IDEM.

D.1.8 Record Keeping Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit), and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

- (a) To document compliance with Conditions D.5.3 and D.5.6, the Permittee shall maintain the following records:
 - (1) daily pressure drop readings across the iron sponge reactor annubar; and
 - (2) weekly analysis of the TRS outlet concentration from the iron sponge reactor.
- (b) Pursuant to 40 CFR 60.116b(b), Subpart Kb (New Source Performance Standard for Volatile Organic Liquid Storage Vessels) and CP157-4363, issued August 28, 1996, the Permittee shall keep readily accessible records of the dimensions and capacity for each bio-solids storage tank. These records shall be kept for the life of the source.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Eli Lilly and Company
Source Address: 1650 Lilly Road, Lafayette, Indiana 47909
Mailing Address: 1650 Lilly Road, Lafayette, Indiana 47909
Source Modification No.: 157-18322-00006

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- ? Test Result (specify)
- ? Report (specify)
- ? Notification (specify)
- ? Affidavit (specify)
- ? Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Permit Modification to a Minor Source Modification

Source Name: Eli Lilly & Company – Tippecanoe Labs
Source Location: 1650 Lilly Road, Lafayette, IN 47909
County: Tippecanoe
SIC Code: 2834, 2879
Permit Modification No.: 157-18322-00006
Permit Reviewer: Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from Eli Lilly & Company, relating to the operation of a stationary source that produces pharmaceutical products.

On January 23, 2004, Eli Lilly & Company submitted comments on the draft permit modification No. 157-18322-00006. The summary of the comments and corresponding responses is as follows:

Comment 1:

Condition B.7(d) should be changed as follows:

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement. **Delete last sentence- duplicative of (e)**

Response 1:

The condition has been modified as requested:

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement. ~~IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.~~

Comment 2:

Condition C.10 should be modified to match Part 70 permit language.

Response 2:

Condition C.10 has been modified as follows (~~strikeout~~ to show deletions and **bold** to show additions):

C.10 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction Plan (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.** A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the

Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)**; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
- (c)
- (d)
- (e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) ~~Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

Comment 3: Change compliance monitoring to match Part 70 language.

Response 3: Condition C.7 is modified to match Part 70 language:

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] **[326 IAC 3-5]**

~~If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.~~

- (a) This section applies to the operation and maintenance of equipment and devices specified in Section D of this permit to determine or monitor compliance, except that it does not apply to continuous emissions monitoring systems or continuous opacity monitoring systems described in Section D.
- (b) Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification, which shall be submitted by the Permittee, does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.
- (d) The Permittee shall keep records of monitoring system operation that include the following:
 - (1) All maintenance logs, calibration checks, and other required quality assurance activities.
 - (2) All records of corrective and preventive action.
 - (3) A log of monitoring system downtime, including the following:
 - (A) Date of monitoring system downtime.
 - (B) Time of commencement and completion of each downtime.
 - (C) Reason for each downtime.
- (e) The Permittee shall submit a report of monitoring system downtime as specified in Section D. The report shall include the following:

- (1) **Date of monitoring system downtime.**
- (2) **Time of commencement.**
- (3) **Duration of each downtime.**
- (4) **Reasons for each downtime.**
- (5) **Nature of system repairs and adjustments.**

Comment 4:

Condition C.13 should be modified to match Part 70 language.

Response 4:

Condition C.13 has been modified as follows:

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)] **[326 IAC 2-1.1-11]**

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(a-b) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b-c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c-d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(d-e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Comment 5:

Condition D.1.4 should be modified to match Part 70 language:

Response 5:

Condition D.1.4 is modified as follows:

D.1.4 ~~PSD Minor Limit [326 IAC 2-2]~~ Emission Limitations and Standards [326 IAC 2-2, CP 157-4363 Issued August 28, 1996, and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

To avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), the Permittee shall comply with the following:

- (a) The total reduced sulfur (TRS) emissions from the iron sponge reactor shall not equal or exceed 2.28 pounds per hour, which is equivalent to 762 micrograms per liter (ug/l). This emission limitation also satisfies the emission limitations for reduced sulfur compounds and hydrogen sulfide; and**
- (b) TRS, reduced sulfur compounds and hydrogen sulfide emissions from the transfer of bio-solids from the storage tanks to trucks shall be controlled by a vapor balance system that exhausts to the iron sponge reactor.**

~~At least one chamber of the iron sponge scrubber shall operate at all times that the bio-solids tanks (A, B, C, and D) are operated in the pressure drop and air flow rate ranges determined in the compliance tests to maintain a minimum of 90% hydrogen sulfide, and methane thiol control efficiencies. This shall ensure that the emissions each of hydrogen sulfide (H₂S), total reduced sulfur (TRS), and reduced sulfur compounds (RSC) from all four bio-storage tanks A, B, C, and D, are limited to less than 10 tons per year. Therefore, 326 IAC 2-2 shall not apply.~~

Comment 6:

Condition D.1.6 should read as follows to match Proposed Part 70 permit:

D.1.6 ~~Parametric Monitoring~~ Monitoring Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit), and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

The Permittee shall monitor and record the pressure drop across the iron sponge reactor annubar once per day. Unless operated under conditions for which the Compliance Response Plan (CRP) specifies otherwise, the pressure drop across the annubar shall be maintained in a range of 0.2 and 2 inches of water column. The CRP for the Iron Sponge reactor system shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above-mentioned range for any one reading.

Response 6:

Condition D.1.6 is modified as requested.

Comment 7:

Condition D.1.7 should read as follows to match Proposed Part 70 permit:

D.1.7 Sampling and Analysis Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit), and Amendment 157-8953 Issued November 12, 1997 (Revised by this Permit)]

To demonstrate compliance with Condition D.1.4, the permittee shall measure and record the TRS outlet concentration of the air stream to the atmosphere once per calendar week using the sampling protocol and analysis methods most recently approved by IDEM.

Response 7:

Condition D.1.7 is modified as requested.

Comment 8:

Condition D.1.9 should be deleted (Notice of Malfunction) to match Proposed Part 70 permit.

Response 8:

Condition D.1.9 has been deleted as requested, and Table of Contents has been modified.

~~D.1.9 Notice of Malfunction [326 IAC 1-6-2]~~

~~(a) A record of all malfunctions, including startups and shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to IDEM, OAQ or appointed representative upon request.~~

~~(b) When a malfunction of any emission facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the malfunctions Report Forms. Notification shall be made by telephone or facsimile, as soon as practicable, but no later than four (4) daytime business hours after the beginning of said occurrence.~~

~~(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).~~

~~(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner [326 IAC 1-2-39].~~

Comment 9:

Record Keeping Requirements in Condition D.1.8 should be changed to match Part 70 language.

Response 9:

Condition D.1.8 is modified as follows:

~~D.1.8 New Source Performance Standards (NSPS) Part 60.116(b), Subpart Kb — Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984~~

~~———— (a) The source shall keep readily accessible records showing the dimensions of the storage Tank and an analysis showing the capacities of the storage Tank A.~~

~~———— (b) These records shall be kept for the life of the tank and made available upon request to the Office of Air Quality.~~

D.1.8 Record Keeping Requirements [CP 157-4363 Issued August 28, 1996 (Revised by this permit), and Amendment 157-8953 Issued November 12, 1997 (Revised by this permit)]

- (a) To document compliance with Conditions D.5.3 and D.5.6, the Permittee shall maintain the following records:**

 - (1) daily pressure drop readings across the iron sponge reactor annubar; and**
 - (2) weekly analysis of the TRS outlet concentration from the iron sponge reactor.**
- (b) Pursuant to 40 CFR 60.116b(b), Subpart Kb (New Source Performance Standard for Volatile Organic Liquid Storage Vessels) and CP157-4363, issued August 28, 1996, the Permittee shall keep readily accessible records of the dimensions and capacity for each bio-solids storage tank. These records shall be kept for the life of the source.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Minor Permit Modification to a Minor Source
Modification**

Source Background and Description

Source Name:	Eli Lilly & Company – Tippecanoe Labs
Source Location:	1650 Lilly Road, Lafayette, IN 47909
County:	Tippecanoe
SIC Code:	2834, 2879
Permit Modification No.:	157-18322-00006
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a modification application from Eli Lilly & Company, relating to the operation of a stationary source that produces pharmaceutical products.

Explanation of Modification

Minor Source Modification No. 157-18010-00006, issued on October 21, 2003, authorized Eli Lilly & Company to replace one (1) of four (4) bio-solids storage tanks, equipped with an iron sponge scrubber. These four (4) tanks were initially permitted under CP 157-4363, issued in 1996. In this construction permit, the source was kept below the 10 tons per year PSD significant emission rate for Total Reduced Sulfur (TRS) and hydrogen sulfide (H₂S) by limiting the TRS to less than 300 ppm. This CP also established monitoring conditions for the iron sponge scrubber.

In draft Part 70 permit No.: T157-6879-00006, the emission limit for H₂S/TRS has been increased to 762 ppm, representing an annual emission rate of 10 tons per year. In minor source modification no. 157-18010, instead of limiting emissions of H₂S/TRS through a ppm limit, a 90% control efficiency on the iron sponge scrubber was included. Eli Lilly & Company has requested that this condition be changed, in order to align the compliance requirements in the MSM No. 157-18010-00006 with that in draft Part 70 No.: T157-6879-00006.

In addition, Eli Lilly & Company has requested other minor changes, including responsible official name, and changes to permit language in conditions in sections B and C.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 15, 2003.

Conclusion

This permit modification shall be added to the conditions of the Minor Source Modification No.: 157-18010-00006 as Minor Permit Modification No.: 157-18322-00006.

CHANGES TO PERMIT CONDITIONS

The following changes have been made to Minor Source Modification No.: 157-18010-00006 (~~strikeout~~ to show deletions and **bold** to show additions):

- (1) In section A.1, the responsible official name is changed. The "new Responsible Official" is the General Manager and meets the definition in 326 IAC 2-7-1(34).

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
The Permittee owns and operates a stationary source that produces pharmaceutical products.

Responsible Official:	Kenny McCleary Lawrence McShane Sr.
Source Address:	1650 Lilly Road, Lafayette, Indiana 47909
Mailing Address:	1650 Lilly Road, Lafayette, Indiana 47909
General Source Phone Number:	765-477-4006
SIC Code:	2834 and 2879

- (2) Paragraphs C.1 (Certification), C.2 (Preventive Maintenance Plan), C.3 (Permit Amendment or Modification), and C.14 (Emergency Provisions) are moved to Section B.

- (3) C.2 (moved to section B) is modified as follows to be consistent with the draft Title V permit:

- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes ~~or contributes to any violation~~ **or is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

- (4) Condition C.5 is modified as follows:

C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). **326 IAC 6-4-2(4) is not federally enforceable.**

- (5) Condition C.7 is modified as follows to be consistent with the Title V draft permit:

C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted ~~by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

- (6) Eli Lilly requested that Condition C.13(f) (Compliance Response Plan) be deleted. This does not match the language in draft Part 70 No. 157-6879-00006. Therefore, this request is denied.
- (7) The last sentence in Condition C.15 is modified as follows:

The **response action** documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (8) Condition C.16(a) is modified as follows:

Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, ~~or report, or application.~~ These records shall be **physically present or electronically accessible** kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (9) Condition D.1.4 is modified as follows to match the requirements in draft Part 70 permit No.: 157-6879-00006.

D.1.4 PSD Minor Limit [326 IAC 2-2]

~~At least one chamber of the iron sponge scrubber shall operate at all times that the bio-solids tanks (A, B, C, and D) are operated in the pressure drop and air flow rate ranges determined in the compliance tests to maintain a minimum of 90% hydrogen sulfide, and methane thiol control efficiencies. This shall ensure that the emissions each of hydrogen sulfide (H₂S), total reduced sulfur (TRS), and reduced sulfur compounds (RSC) from all four bio-storage tanks A, B, C, and D, are limited to less than 10 tons per year.~~ **At least one chamber of the iron sponge reactor shall be operated at all times that the bio solids tanks (A, B, C, and D) are operated. The total reduced sulfur (TRS) emissions from the iron sponge reactor shall not equal or exceed 2.28 pounds per hour, which is equivalent to 762 micrograms per liter (? g/l). This emission limitation also satisfies the emission limitations for reduced sulfur compounds and hydrogen sulfide.** Therefore, 326 IAC 2-2 shall not apply.

- (10) Condition D.1.6 is modified as follows:

D.1.6 Parametric Monitoring

In order to demonstrate compliance with Condition D.1.4, the following monitoring conditions are applicable:

- (a) The pressure drop ~~across and air flow rate~~ of the iron sponge ~~reactor annubar scrubber~~ shall be monitored;
- (b) **To demonstrate compliance with Condition D.1.4, the permittee shall measure and record the TRS outlet concentration of the air stream to the atmosphere once per calendar week using the sampling protocol and analysis methods most recently approved by IDEM.** ~~The hydrogen sulfide and methane thiol control efficiencies of the iron scrubber shall be measured once each calendar week, during which the iron sponge scrubber is in operation, by the stack sampling and analysis in accordance with the source protocol most recently approved by IDEM. For instances when the concentrations are below the limit of detection of the assay, the control efficiency shall be assumed to be the same as the previous calendar week;~~
- (c) ~~A vapor balance system shall be used when the bio-solids are transferred out of Tank A into the trucks;~~
- (d) ~~No more than one of the bio-solids storage tanks (Tanks A, B, C, and D) shall be recycled at a time.~~

(11) Condition D.1.7 is modified as follows:

D.1.7 Hydrogen Sulfide (H₂S), Total Reduced Sulfur (TRS), and Reduced Sulfur Compounds (RSC)

In order to demonstrate compliance with Conditions D.1.4, the source shall record the following:

- (a) The pressure drop across the **iron sponge annubar shall be recorded at least every calendar day** ~~scrubber column and the air flow rate through the scrubber column at least every calendar day when in operation;~~
- (b) **The TRS outlet concentration from the iron sponge reactor shall be recorded once per calendar week;** ~~The results of the monitoring of the hydrogen sulfide and methane thiol control efficiencies of the iron sponge scrubber, in accordance with Condition D.1.6(b);~~
- (c) ~~The time during which the iron sponge scrubber was not operated; and~~
- (d) ~~The corrective actions taken to bring the iron sponge scrubber to the normal operation.~~
- (e) ~~A log of information necessary to document compliance with D.1.6 shall be kept for at least the past 36 month period, and shall be made available to OAQ upon request.~~